

DOCKET NO. HHD-CV20-6134531-S	:	SUPERIOR COURT
	:	
STATE OF CONNECTICUT	:	
EX REL WILLIAM TONG,	:	
ATTORNEY GENERAL	:	JUDICIAL DISTRICT OF HARTFORD
	:	
V.	:	AT HARTFORD
	:	
DAVID DUNN	:	JANUARY 26, 2021

PLAINTIFF’S REPLY TO DEFENDANT’S SPECIAL DEFENSES

Pursuant to Conn. Prac. Book § 10-56, the Plaintiff, the State of Connecticut, replies to the Defendant’s Special Defenses dated January 15, 2021 as follows:

1. Insofar as the Defendant’s First Special Defense alleges the defendant “has already made restitution for any monetary loss suffered by the City of Bridgeport as a result of defendant's conduct,” the Plaintiff does not have sufficient information to respond and leaves the Defendant to his proof.
2. The remaining portion of the Defendant’s First Special Defense states a legal conclusion to which no response is necessary.
3. Insofar as the Defendant’s Second Special Defense alleges the defendant “voluntarily provided information to law enforcement concerning the commission of a crime related to a municipal employee who had a greater degree of culpability for such crime than the defendant prior to learning of a criminal investigation into such crime,” the Plaintiff does not have sufficient information to respond and leaves the Defendant to his proof.

4. The remaining portion of the Defendant's Second Special Defense states a legal conclusion to which no response is necessary.

Respectfully submitted,

THE STATE OF CONNECTICUT

WILLIAM TONG
ATTORNEY GENERAL

BY: /s/ 426801
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CERTIFICATION

I hereby certify that a copy of the foregoing Plaintiff's Response was mailed or electronically delivered in accordance with Conn. Prac. Book § 10-12 on January 26, 2021, to all counsel and/or pro se parties of record, as follows:

**Barry C. Knott, Esq.
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/s/ 426801
Gregory K. O'Connell
Commissioner of the Superior Court